EXHIBIT A Redacted Version of Document Sought to be Sealed

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16		
17		DISTRICT COURT
10		CT OF CALIFORNIA DIVISION
18	SAN JOSE	DIVISION
19	CHASOM BROWN, WILLIAM BYATT,	
20	JEREMY DAVIS, CHRISTOPHER	Case No.: 5:20-cv-03664-LHK-SVK
20	CASTILLO, and MONIQUE TRUJILLO	
21	individually and on behalf of all other	[PROPOSED] ORDER REQUIRING
	similarly situated,	GOOGLE TO ADD CUSTODIANS AND
22	D1-:4:66-	RUN ADDITIONAL SEARCHES FOR
23	Plaintiffs,	CURRENT CUSTODIANS (DISPUTES P1 AND P2)
24	VS.	
25	GOOGLE LLC,	
26	Defendant.	
27		
28		CASE NO. 5:20-cv-03664-LHK-SVI

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[PROPOSED] ORDER

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Incognito

1. Ben Azose

Before the Court is Plaintiffs' request for an Order requiring Google to add custodians (Dispute P1) and to use additional searches for the current Google custodians (Dispute P2). Having considered Plaintiffs' requests, and good cause having been shown, the Court **GRANTS** Plaintiffs' requests and **ORDERS** as follows:

For Google custodians Glenn Bernston, Deepti Bhatnagar, Sabine Borsay, Greg Fair, Helen Harris, Abdelkarim Mardini, Justin Schuh, Dan Stone, Alexei Svitkine, Keith Wright, Adrienne Porter Felt, Sam Heft-Luthy, Russ Ketchum, and Chris Liao, Google shall run the following searches and produce additional responsive documents by September 10, 2021:

- Incognito
- Eprivacy OR (consent! /3 ready) OR consentless
- (summer OR privacy) /2 moment
- "OR
- GWS /10 (ID OR identif!)
- OTR OR (off /3 record)
- OR OR cookie!
- OR "
- •
- Trusted /2 (surface OR space)
- State of space)
- X-Client /10 (data OR header OR variation)
- ! OR OR unauth!

In addition, to the extent Google has not agreed to add the Google employees identified below, the following employees shall be designated as custodians and, for each custodian, to the extent Google has not agreed to the searches underneath the custodians' name, Google shall run the searches and Google shall substantially complete production by September 10, 2021.

CASE NO. 5:20-cv-03664-LHK-SVK [PROPOSED] ORDER RE: GOOGLE'S CUSTODIANS AND SEARCHES

1	• inPrivate
2	Private! /3 (brows! OR mode)OR
	"Identifier! OR UID
3	• "opt out" OR "opt-out"
4	 (tie OR tying OR link!) /5 (brows! OR session!)
5	• OR OR OR "Consideration of the Consideration of t
6	• OR OR OR
	2. Nina Ilieva
7	 Incognito
8	• inPrivate
9	Private! /3 (brows! OR mode)OR
10	"Identifier! OR UID
	• "opt out" OR "opt-out"
11	 (tie OR tying OR link!) /5 (brows! OR session!)
12	• OR OR "OR "OR OR OR
13	• OR OR OR
14	3. Sammit Adhya
	• Incognito
15	inPrivatePrivate! /3 (brows! OR mode)
16	 User! /15 (study OR studies OR understand! OR confuse!)
17	• "Identity management"
18	 "AND (fail* OR review* OR analy*) OR "Box OR
	• (third OR 3rd OR 3d) /3 cookie*
19	• OR Seedo*
20	• ePrivacy
21	• consent* /3 ready • """
22	• account /3 particle
	• OR OR OR OR
23	• OR OR
24	4. Suneeti Shah Vakharia
25	IncognitoinPrivate
26	• Private! /3 (brows! OR mode)
	• OTR OR (off /3 record)
27	 "Books" User! /15 (understand! OR confuse!)
28	CASE NO. 5:20-cv-03664-LHK-SVK [PROPOSED] ORDER RE: GOOGLE'S CUSTODIANS AND SEARCHES

1	Consent!OR
2	5. Richard Jui-Chieh Hsu
3	• Incognito
	• inPrivate
4	• Private! /3 (brows! OR mode)
5	 OTR OR (off /3 record) Image: OR cookie!
6	•
7	• OR OR OR
8	6. Alex Ainslie
	IncognitoinPrivate
9	Private! /3 (brows! OR mode)
10	• OTR OR (off /3 record)
11	• OR "
12	Histogram!(third OR 3rd OR 3d) /3 cookie!
	• OR OR OR OR OR
13	• OR OR OR
14	7. Arne de Booj
15	IncognitoinPrivate
16	Private! /3 (brows! OR mode)
17	• Consent!
	 Unauth! OR "signed out" OR OR O
18	Anonym! OR pseudonymous
19	• OR OR
20	8. Benjamin Poiesz
21	• Incognito
22	inPrivatePrivate! /3 (brows! OR mode)
	• OTR OR (off /3 record)
23	• OR "OR "OR "OR OR O
24	• rev! /3 (share OR impact)
25	• OR OR
26	9. Breen Baker
	• Incognito
27	inPrivate
28	CASE NO. 5:20-cv-03664-LHK-SVK

[PROPOSED] ORDER RE: GOOGLE'S CUSTODIANS AND SEARCHES

1	• Private! /3 (brows! OR mode)
2	OR OR cookie!conver! OR track!
	Anonym! OR pseudonymous OR unauth!
3	• OR OR
4	10. Brad Townsend
5	• Incognito
6	inPrivatePrivate! /3 (brows! OR mode)
	• Firefox
7	• OR OR cookie!
8	conver! OR track! OR remarket!Anonym! OR pseudonymous OR unauth!
9	• consent!
10	• OR OR
	11. Chetna Bindra
11	 Incognito
12	• inPrivate
13	Private! /3 (brows! OR mode)OR Cookie!
14	Anonym! OR pseudonymous OR unauth!
	• OR " " " "
15	• OR OR
16	12. Chris Palmer
17	IncognitoinPrivate
18	Private! /3 (brows! OR mode)
	• OTR OR (off /3 record)
19	• (User! OR people) /10 confus!
20	Track!Cookie!
21	• OR OR
22	13. David Monsees
	 Incognito
23	• inPrivate • Private 1/2 (haraya LOP, mada)
24	Private! /3 (brows! OR mode)OR "
25	• OR OR OR OR OR
26	
	• (user! OR people) /10 (privacy OR consent!)
27	• OR OR OR OR
28	CASE NO. 5:20-cv-03664-LHK-SVK
	[PROPOSED] ORDER RE: GOOGLE'S CUSTODIANS AND SEARCHES

1	14. Deepak Ravichandran
2	 Incognito
	• inPrivate
3	 Private! /3 (brows! OR mode) study AND (impact OR revenue OR sustain* OR advertis* OR publish*)
4	• SameSite
5	 nitish OR korula
-	•
6	 OR OR cookie! (user AND profile) AND (publish! OR remarket! OR rmktg)
7	• OR OR OR
8	15. Dmitry Titov
9	• Incognito
9	• inPrivate
10	• Private! /3 (brows! OR mode)
11	• OTR OR (off /3 record)
12	OR OR cookie!Anonym! OR pseudonymous OR unauth!
	• Consent!
13	Profile AND brows!
14	• "Change Commit"
15	 "Chrome Summit" OR OR
	16. Florian Uunk
16	• Incognito
17	• inPrivate
18	• Private! /3 (brows! OR mode)
10	• OTR OR (off /3 record)
19	OR OR cookie!Anonym! OR pseudonymous OR unauth!
20	• OR " "
21	• OR OR OR OR OR
22	• OR OR
22	17. Haskell Garon
23	• Incognito
24	• inPrivate • Private /3 (brows! OP mode)
25	 Private! /3 (brows! OR mode) (user OR data OR brows!) /25 (avichan! OR profit! OR revenue)
	• OR OR OR OR OR OR
26	• OR OR
27	18. Hyewon Jun

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1	• Incognito
2	inPrivatePrivate! /3 (brows! OR mode)
3	• block! AND (impact! OR revenue! OR sustain! OR advertis! OR Mozilla
	OR Firefox OR Microsoft OR Edge) • browser AND restrict* AND cookie!
4	• OR OR
5	OR OR cookie!PPID OR ICM
6	• OR OR OR "OR OR OR
7	• OR OR
8	19. Lorraine Twohill
9	IncognitoinPrivate
10	• Private! /3 (brows! OR mode)
	Block! /5 cookie!OR "
11	• OR OR OR "OR OR OR
12	• OR OR
13	20. Michael Kleber
14	IncognitoinPrivate
15	• Private! /3 (brows! OR mode)
16	OTR OR (off /3 record)III OR OR cookie!
17	Anonym! OR pseudonymous OR unauth!
	Ad! AND conver! AND track!
18	 Chrome AND conver! AND measure! OR OR OR OR OR OR OR
19	• OR OR
20	21. Mike Pinkerton
21	IncognitoinPrivate
22	Private! /3 (brows! OR mode)
23	• OTR OR (off /3 record)
24	• OR "OR "" • OR
	22. Nitish Korula
25	 Incognito
26	inPrivatePrivate! /3 (brows! OR mode)
27	• OR OR cookie!
28	CASE NO. 5:20-cv-03664-LHK-SVK
	[PROPOSED] ORDER RE: GOOGLE'S CUSTODIANS AND SEARCHES

1	 study AND (impact OR revenue OR sustain* OR advertis* OR publish*) SameSite
2	•
3	 (user AND profile) AND (publish! OR remarket! OR rmktg) OR OR
4	23. Othar Hansson
5	• Incognito
	• inPrivate • Private /2 (brown) OP mode)
6	Private! /3 (brows! OR mode)OTR OR (off /3 record)
7	• OR """
8	• (user OR user's OR users OR data) /5 (transparen! OR control! OR consent!)
9	• OR OR OR OR
10	• OR OR
11	24. Qi Dong • Incognito
12	• inPrivate
13	Private! /3 (brows! OR mode)OR Cookie!
14	Anonym! OR pseudonymous OR unauth!
	• OR OR
15	25. Rory McClelland
16	IncognitoinPrivate
17	• Private! /3 (brows! OR mode)
18	 OTR OR (off /3 record) (third OR 3rd OR 3d) /3 cookie!
19	• OR OR "or OR OR
20	track! OR antitrack! OR anti-track!OR OR
21	26. Sree Pothana
22	• Incognito
23	• inPrivate • Private /2 (brows! OP mode)
	Private! /3 (brows! OR mode)Identifier! OR "user ID" OR gaia!
24	• OR OR cookie!
25	Log! OR plog!Anonym! OR pseudonymous OR unauth!
26	• OR OR
27	27. Steve Hamilton
28	CASE NO. 5:20-cv-03664-I HK-SV

1	• Incognito
2	inPrivatePrivate! /3 (brows! OR mode)
3	• OTR OR (off /3 record)
4	OR " or OR
5	• OR OR
	28. Tim Hsieh
6	IncognitoinPrivate
7	Private! /3 (brows! OR mode)OTR OR (off /3 record)
8	Cookie! OR DoubleClick
9	 CCPA OR (privacy /5 (law! OR regulation!) OR OR OR
10	29. Vivek Sekhar
11	 Incognito
12	inPrivatePrivate! /3 (brows! OR mode)
13	• (third OR 3rd OR 3d) /3 cookie!
14	• OR "OR "" OR " OR " OR " OR " OR " OR
15	• OR OR
16	30. Garth Shoemaker
17	IncognitoinPrivate
18	• Private! /3 (brows! OR mode)
19	Consent!OR OR OR OR OR OR
20	• OR OR
21	31. Ramin Halavati • Incognito
22	• inPrivate
23	Private! /3 (brows! OR mode)OR "
24	• Consent!
25	Anonym! OR pseudonymousOR OR O
26	• OR ! OR
27	32. Burton Rast
28	• Incognito
۷۵	CASE NO. 5:20-cv-03664-LHK-SVK [PROPOSED] ORDER RE: GOOGLE'S CUSTODIANS AND SEARCHES

1	• inPrivate
2	 Private! /3 (brows! OR mode) (user! OR people) /10 (privacy OR consent!)
3	• OR " " "
4	• OR OR OR OR OR OR
5	33. Martin Shelton
6	IncognitoinPrivate
7	• Private! /3 (brows! OR mode)
8	OTR OR (off /3 record)OR "
9	• OR OR OR OR OR OR
10	34. Luke Hedrick
11	IncognitoinPrivate
12	• Private! /3 (brows! OR mode)
13	• OR OR OR
14	In addition, there will be at least 60 Google custodians. Plaintiffs must show good cause
15	for additional Google custodians beyond 60. The deadline for adding additional Google custodians
16	and searches shall be October 1.
17	IT IS SO ORDERED.
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19	DATED:
20	Honorable Susan van Keulen United States Magistrate Judge
21	Office States Magistrate Judge
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27	
28	CASE NO. 5:20-cv-03664-LHK-SVK IPROPOSEDI ORDER RE: GOOGLE'S CUSTODIANS AND SEARCHES